

# Exhibit “B”



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1325 Franklin Avenue, Garden City, NY 11530  
t: 212.471.5100 f: 212.471.5150  
friedmanvartolo.com

May 25, 2023

BRAD J. SADEK  
Sadek and Cooper  
1500 JFK Boulevard  
Ste 220  
Philadelphia, PA 19102

**RE:** Thomas Joseph Farrell, Jr.

Bankruptcy Case No. 22-12497-mdc

Dear Counselor:

Please be advised, this office represents SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of BKPL-EG Basket Trust with regard to the above referenced matter.

Our client has advised us that payments have not been tendered in accordance with the Stipulation entered by Court on March 14, 2023.

This notice is to advise that your client has defaulted on payments required under the terms of the Order and is due for as follows:

Monthly payments due 04/01/2023-05/01/2023 @ \$1,335.99	\$ 2,671.98
Late Charges	\$ 66.80
Suspense Balance	(\$ 9.06)
Total Due and Owing good through 05/31/2023	\$ 2,729.72

Payment should be made by bank or certified funds and mailed directly to:  
SN Servicing Corporation, PO Box 660820, Dallas TX 75266

Pursuant to the Stipulation, you now have ten (10) days, from the date of this notice, to cure this default. Failure to cure default may result in the enforcement of our state law rights.

Acceptance of partial payments will not constitute a waiver of our client's rights to pursue the default in the event the partial payment is not enough to cure the entire default.

Yours truly,  
/s/ Lauren M. Moyer  
Lauren M. Moyer, Esquire

cc:

**Trustee**

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

**U.S. Trustee**

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street  
Suite 320  
Philadelphia, PA 19107

**Debtor**

Thomas Joseph Farrell, Jr.  
2218 E Cumberland Street  
Philadelphia, PA 19125